

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:

GENESIS NETWORKS TELECOM
SERVICES, LLC,

DEBTOR

§
§
§
§
§

CASE NO. 24-50224-mmp

CHAPTER 7

**DEBTOR'S MOTION FOR ENLARGEMENT OF TIME IN WHICH
TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

AN ORDER WILL BE ENTERED GRANTING THE RELIEF REQUESTED HEREIN WITHOUT FURTHER HEARING UNLESS A WRITTEN OBJECTION AND REQUEST FOR HEARING IS FILED WITH THE CLERK WITHIN TWENTY-ONE (21) DAYS OF THE DATE OF ISSUANCE OF THIS NOTICE. ANY SUCH OBJECTION MUST ALSO BE SERVED UPON THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

TO THE HONORABLE MICHAEL M. PARKER, U.S. BANKRUPTCY JUDGE:

Genesis Networks Telecom Services, LLC, Debtor, respectfully represents:

1. The Debtor filed an emergency petition for relief under Chapter 7 of the Bankruptcy Code on February 19, 2024, without the full set of schedules and statement of financial affairs. The case was filed on an expedited basis due to numerous pending lawsuits.

2. Pursuant to Rule 1007(a) and (c) of the Bankruptcy Rules of Procedure, the debtor's schedules are due to be filed within fourteen days after the filing date which in this case is March 4, 2024.

3. The Debtor's agent is in the process of meeting with counsel to prepare the Debtor's schedules and statement of financial affairs.

4. Due to the lack of time to fully prepare this case for filing prepetition, the schedules and statement of financial affairs were not filed with the petition. Due to

time constraints of counsel and the Debtor's agent, they have not had sufficient time to meet and to complete the required documents and materials described above. The Debtor and counsel need through March 15, 2024 to accomplish the required document preparation and filing.

5. Counsel has not completed the analysis of the Debtor's financial records to document the Debtor's assets and transfers, if any, to creditors which should be included in the statement of financial affairs.

6. The Debtor requests an enlargement of time in which to complete its schedules and statement of financial affairs, pursuant to Rule 1007 of the Bankruptcy Rules of Procedure through March 15, 2024.

7. A §341 meeting has been scheduled in this case for March 19, 2024.

8. The enlargement of time requested is in the best interest of the Debtor's estate and of its creditors.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays as aforesaid.

Dated: March 4, 2024.

Respectfully submitted,

LAW OFFICES OF MARTIN SEIDLER
One Elm Place, Suite E-504
11107 Wurzbach Road
San Antonio, Texas 78230
(210) 694-0300
(210) 690-9886 Telecopier
Email: marty@seidlerlaw.com

By: /s/ Martin Seidler
Martin Seidler, #18000800
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served on all parties authorized to receive notice through the ECF notice system and/or on the attached matrix for this case on this 4th day of March, 2024.

/s/ Martin Seidler
Martin Seidler

Label Matrix for local noticing

0542-5

Case 24-50224-mmp

Western District of Texas

San Antonio

Mon Mar 4 16:36:47 CST 2024

AT & TSvcs, Inc./Christin Jones

Kilpatrick, Townsend & Stockton

2001 Ross Ave. #4400

Dallas, TX 75201-2924

Genesis Networks Telecom Services, LLC

1354 N. Loop 1604 E, Suite 103

San Antonio, TX 78232-1342

U.S. BANKRUPTCY COURT

615 E. HOUSTON STREET, ROOM 597

SAN ANTONIO, TX 78205-2055

Arris Solutions, Inc.

3871 Lakefield Dr. #300

Suwanee, GA 30024-1292

Arris Solutions, Inc.

c/o Amy Ruhland/DLA PIPER LLP

303 Colorado St. #3000

Austin, TX 78701-4654

(p) LINEBARGER GOGGAN BLAIR & SAMPSON LLP

ATTN DON STECKER

112 E PECAN

SUITE 2200

SAN ANTONIO TX 78205-1588

Carl Obermiller, Stinson

1201 Walnut Street, Suite 2900

Kansas City, MO 64106-2178

Dist. Clerk #2021 CI 24147

101 W. Nueva #217

San Antonio, TX 78205-3411

Dist. Clerk #DC 21-00837

600 Commerce St. #103

Dallas, TX 75202-6604

Dist. Clrk. #3:32CV 02397 S

1100 Commerce St. #1452

Dallas, TX 75242-1310

FedEX Supply Chain Logistics&Elec.

1612 HUTTON DR STE 120

Carrollton, TX 75006-6675

FedEX Supply Chain Logistics&Elec.

c/o THE CORP TRUST CO

1209 ORANGE ST.

WILMINGTON, DE. 19801-1120

FedEX Supply ChainLogst&Elec.

c/o SKeenanCarter/Butler Snow

6075 Poplar Ave #500

Memphis, TN 38119-0102

GNET ATC, LLC

c/o Theodore Geiger

85 Broad St. 18th Fl.

New York, N. Y. 10004-2783

GNET ATC, LLC.

c/o Goodman Networks

6505 W. Park Blvd. #306

Plano, TX 75093-6212

Goodman Networks, Inc.

2801 Networks Blvd. #300

Frisco, TX 75034-1881

Goodman Networks, Inc.

c/o David Parham

2001 Ross Ave. #3600

Dallas, TX 75201-2938

Goodman Networks, LLC

c/o Scott Seidel, Trustee

6505 W. Park Blvd. #306

Plano, TX 75093-6212

Matthias Kleinsasser

Winstead, PC

300 Throckmorton St. #1700

Ft. Worth, TX 76102-2928

Network Investments, LLC

3820 N. Louise Ave.

P. O. Box 5114

Sioux Falls, SD 57117-5114

Scott M. Seidel

c/o Thomas Berghman

Munsch Hardt Kopf & Harr, PC

500 N Akard St Ste 4000

Dallas TX 75201-6605

Scott Seidel/Trustee Goodman Networks

6505 W. Park Blvd. #306

Plano, TX 75093-6212

Scott Seidel/Trustee Goodman Networks

c/o Davor Rukavina

500 N. Akard St. #3800

Dallas, TX 75201-6659

Scott Seidel/Trustee Goodman Networks

c/o Michael Quilling

2001 Bryan St. #1800

Dallas, TX 75201-3070

U. S. Trustee

1100 Commerce St. Rm 976

Dallas, TX 75242-0996

U. S. Trustee

615 E. Houston St., #533

San Antonio, Texas 78205-2055

U.S. Bankrtcy Clerk #22-31641

1100 Commerce St. #1254

Dallas, TX 75242-1305

U.S.Bankrtcy ClerkAdv.23-03035

1100 Commerce St. #1254

Dallas, TX 75242-1305

United States Trustee - SA12

US Trustee's Office

615 E Houston, Suite 533

San Antonio, TX 78205-2055

Vedder Price/David Rownd
1633 Broadway 31st Floor
New York, N. Y. 10019-6764

Wiström Neweb Corporation
c/o Jacob Englander
747 3rd Ave. 16th Fl.
New York, NY 10017-2856

Johnny W Thomas Jr
johnnywthomas.trusteblogs.com
St Paul Square
1153 E Commerce
San Antonio, TX 78205-3305

Martin Seidler
Law Offices of Martin Seidler
11107 Wurzbach, Suite 504
One Elm Place
San Antonio, TX 78230

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bexar County
c/o Don Stecker
112 E. Pecan Street, Suite 2200
San Antonio, TX 78205

End of Label Matrix	
Mailable recipients	33
Bypassed recipients	0
Total	33